



# DEPARTMENT OF CONSERVATION

*Managing California's Working Lands*

## DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

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March 18, 2015

[Operator]

Dear [Agent]:

The Division of Oil, Gas, and Geothermal Resources (Division) has been continuing its review of its Underground Injection Control (UIC) program to identify areas in its program that may not be in compliance with state and federal mandates. The priority of this review is to evaluate the zones with the highest water quality first. This first phase is focused on those zones used for injection that were permitted by the Division into non-exempt, non-hydrocarbon producing zones for the injection of Class II fluids with a total dissolved solids (TDS) of less than 3,000 mg/l. The result of this review has identified around 176 wells that may be injecting into zones that may not be exempted under the Safe Drinking Water Act. The Division is continuing its evaluation and is requesting the assistance of those operators that operate these potential wells that the Division has identified. The list of permitted wells is for wells that were permitted to inject, and the Division is aware this list is not necessarily a list of wells that did inject. The list of potential wells indicates that you may operate one or more of these wells. The Division is aware that many of you have already contacted the Division and have already begun the dialog to determine the status of the wells. Through these conversations, the Division has removed some of these wells from consideration, and this has been indicated on the list of 176 wells. For those of you who have not contacted the Division, the Division would like to work with you to determine the status of these wells and determine if the wells are currently injecting, or have the ability to inject into a non-exempt zone. To assist you in this evaluation, the following link will take you to the Division's website to a spreadsheet listing the wells in question.

<ftp://ftp.consrv.ca.gov/pub/oil/UIC%20Files/Wells%20Under%20Review/176%20Wells%20Update.xlsx>

It is imperative that you review the list and determine if your well or wells are either still injecting or capable of injecting into the non-hydrocarbon producing zone with a water quality of less than 3,000 mg/l TDS. If after the evaluation of your wells it is determined that an aquifer exemption is required, the Division will work with you and

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other operators in the area of the well(s) to gather the necessary data to support an aquifer exemption, if warranted. Please be aware that if an aquifer exemption is required, the supporting data must be submitted to the Division as soon as possible. Injection into these zones must cease by October 15, 2015, unless an aquifer exemption has been approved by the US Environmental Protection Agency (US EPA). The process to obtain an aquifer exemption takes time and must first be approved by the State before being submitted to US EPA.

To better assist you with understanding the aquifer exemption process, the Division, State Water Board, and the US EPA are conducting a workshop on March 24, 2015. The details of the workshop are as follows:

**Aquifer Exemption Workshop**

**March 24, 2015**

Holiday Inn Long Beach Airport  
2640 N. Lakewood Blvd.  
Long Beach, CA 90815  
1:00 to 4:00 pm

Please consider attending the workshop and visit our website at <http://www.conservation.ca.gov/dog/Pages/Index.aspx> to view addition pertinent information related to the Division's UIC review.

Sincerely,

Steven Bohlen  
State Oil and Gas Supervisor

Name  
Date  
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